

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

CANON INC.,)	
)	
Plaintiff,)	
)	CIVIL ACTION NO.:
v.)	1:11-cv-03855-AT
)	
COLOR IMAGING, INC. and)	
GENERAL PLASTIC INDUSTRIAL)	
CO., LTD.,)	
)	
Defendants.)	

**PLAINTIFF CANON INC.'S MOTION
TO FILE DOCUMENTS UNDER SEAL**

Pursuant to Section III.f. of Judge Totenberg's Guidelines to Parties and Counsel, Plaintiff Canon Inc. ("Canon") hereby moves for permission to file the following document under seal:

- Portions of Plaintiff Canon Inc.'s Reply in Support of Its Motion for Supplemental Damages, Prejudgment Interest, and Post-Judgment Interest ("Reply")

(provisionally sealed at ECF No. 683). Canon respectfully requests permission to file portions of the Reply under seal because it refers to information Defendants have designated confidential, and/or damages and interest calculations based on information Defendants have designated confidential, on pages 2, 5, and 8.

Concurrently herewith, Canon is filing a public version of the Reply in which only the aforementioned information is redacted.

* * *

Section III.f. of Judge Totenberg's Guidelines to Parties and Counsel requires parties wishing to protect confidential information or materials to submit them to the Court for in camera review, pursuant to Section II.J. of Appendix H to the Local Civil Rules. Canon hereby submits to chambers this motion and a proposed order, together with the document filed provisionally under seal at ECF No. 683).

For the foregoing reasons, Canon respectfully requests that the Court grant this motion.

Respectfully submitted, this 27th day of October, 2017.

/s/ Audra A. Dial

Michael P. Sandonato (*pro hac vice*)

Nicholas M. Cannella (*pro hac vice*)

Peter Shapiro (*pro hac vice*)

Dennis J. McMahon (*pro hac vice*)

Erin J.D. Austin (*pro hac vice*)

FITZPATRICK, CELLA, HARPER & SCINTO

1290 Avenue of the Americas

New York, New York 10104-3800

Tel: (212) 218-2100

Fax: (212) 218-2200

msandonato@fchs.com

ncannella@fchs.com

pshapiro@fchs.com

dmcmahon@fchs.com

eaustin@fchs.com

Edmund J. Haughey (*pro hac vice*)

Chitra M. Kalyanaraman (*pro hac vice*)

FITZPATRICK, CELLA, HARPER & SCINTO

975 F Street, NW

Washington, DC 20004-1462

Tel: (202) 530-1010

Fax: (202) 530-1055

ehaughey@fchs.com

ckalyanaraman@fchs.com

George L. Murphy, Jr. (Georgia Bar No. 530376)

Audra A. Dial (Georgia Bar No. 220298)

KILPATRICK TOWNSEND & STOCKTON LLP

1100 Peachtree Street, Suite 2800

Atlanta, Georgia 30309-4528

Tel: (404) 815-6500

Fax: (404) 815-6555

gmurphy@kilpatricktownsend.com

adial@kilpatricktownsend.com

Attorneys for Plaintiff Canon Inc.

CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing MOTION TO FILE DOCUMENTS UNDER SEAL with the Clerk of Court using the CM/ECF system, which will automatically send e-mail notification of such filing to the following attorneys of record:

Rory Radding (rory.radding@lockelord.com)
Joseph A. Farco (jfarco@lockelord.com)
H. Straat Tenney, IV (straat.tenney@lockelord.com)
Bryan G. Harrison (bryan.harrison@lockelord.com)
Tim Tingkang Xia (tim.xia@lockelord.com)

This 27th day of October, 2017.

/s/ Audra A. Dial

Audra A. Dial

Georgia Bar No. 220298

KILPATRICK TOWNSEND & STOCKTON LLP

1100 Peachtree Street, Suite 2800

Atlanta, Georgia 30309-4528

Tel: (404) 815-6500

Fax: (404) 815-6555

adial@kilpatricktownsend.com